

JIMMY RANDLE : 14TH JUDICIAL DISTRICT COURTVS. NO. 2021-000353 H : CALCASIEU PARISHPINNACLE ENTERTAINMENT, INC. : STATE OF LOUISIANA
D/B/A L'AUBERGE CASINO LAKE
CHARLESFILED: JAN 27 2021 : Jayla Jones
CLERK OF COURT1-27-21
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KDPETITION FOR DAMAGES

The petition of JIMMY RANDLE, a person of the full age of majority, and a resident of the Parish of Calcasieu, State of Louisiana, who with respect represents:

SOANNED

FEB 25 2021

1.

~~Defendant, PINNACLE ENTERTAINMENT, INC., D/B/A L'AUBERGE CASINO LAKE CHARLES, ("L'AUBERGE")~~ 777 L'Auberge Av, Lake Charles, Louisiana, is a foreign corporation authorized to do and doing business in the State of Louisiana who may be served through its registered agent for service of process, C T Corporation System, 3867 Plaza Tower Drive, Baton Rouge, Louisiana 70816.

2.

On January 28, 2020, JIMMY RANDLE, was a patron at L'AUBERGE. Mr. Randle went to the men's restroom, upon entering and after taking only a few steps into the area, he slipped on a wet substance located on the floor, which led to severe and debilitating injuries. It was determined that the source of the wet substance was water. Immediately after falling, a security guard heard him screaming and came into the area, which was later roped off. All of Plaintiff's injuries are 100% caused by the negligence of the Defendant.

3.

PROCESSED

Date: FEB 24 2021

As a result of the accident described hereinabove, PLAINTIFF sustained severe injuries including, but not limited to: his head, shoulders and tailbone, from which he has suffered and will continue to suffer greatly, and as a result of which he is entitled to recover reasonable damages, which exceeds \$75,000.00, for the following items, to-wit:

- a) Loss of enjoyment of life;
- b) Physical pain and suffering, mental anguish and disability, plus permanent impairment of physical function, all past, present and future;
- c) Loss of earning capacity, loss of wages, past, present and future;



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- d) Medical expenses from date of injury to present;
- e) Future medical expenses;
- f) Travel expenses for obtaining medical treatment, past, present and future;

4.

The above-described accident was caused by the fault of Defendant, **PINNACLE**, in the following non-exclusive particulars:

- a) Failure to maintain the premises in a safe condition;
- b) Failure to inspect the premises to insure against unsafe conditions;
- c) Failure to warn customers of unsafe conditions on the premises;
- d) Failure to properly patrol and supervise the premises;
- e) Allowing the premises to become dangerous without taking precautions to safeguard their customers;
- f) Allowing its facility to be designed and constructed in such a manner to allow such dangerous conditions occur;
- g) Failure to properly maintain public areas; and
- h) Any other acts of negligence, which may be proven at the trial of this matter.

5.

On aforementioned date and time, **JIMMY RANDLE** was a patron at all times pertinent hereto. Furthermore, photographs were taken at the scene and a report was made. Due to Mr. Randle having to pick up his minor children up from school, he did not immediately go seek medical attention, but did go to the emergency room shortly thereafter.

6.

JIMMY RANDLE in no way contributed to the occurrence and had no opportunity to avoid the incident and subsequent injuries.

7.

Defendants, **L'AUBERGE**, are solely responsible for all damages sustained by Plaintiff.

WHEREFORE, **JIMMY RANDLE**, PRAY THAT:

I. Defendants, **L'AUBERGE** be duly served with a copy of this petition and cited to answer same in accordance with law.

II. After lapse of all legal delays and due proceedings had, there be judgment herein

in favor of Petitioner, **JIMMY RANDLE**, and against Defendants, **PINNACLE**, for damages as are reasonable in the premises, including but not limited to past, present, and future pain, suffering and mental anguish, past, present and future medical expenses, loss of enjoyment of life and loss of consortium.

III. Further prays for full, general and equitable relief and for all orders and decrees necessary and proper in the premises.

RESPECTFULLY SUBMITTED:

A handwritten signature in black ink, appearing to read 'Brent A. Hawkins', is written over a horizontal line.

BRENT A. HAWKINS #30547
THE HAWKINS LAW GROUP
1417 Hodges Street
Lake Charles, Louisiana 70601
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PLEASE SERVE:

PINNACLE ENTERTAINMENT, INC.
Through their registered agent
C T CORPORATION SYSTEM
3867 Plaza Tower Drive
Baton Rouge, Louisiana 70816